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**THE HONORABLE BRIAN D. LYNCH
CHAPTER 13**

HEARING DATE: October 23, 2019

HEARING TIME: 1:30 P.M.

LOCATION: Tacoma, Washington

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**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF WASHINGTON AT TACOMA**

In re:

GAYLE ELIZABETH OWENS,

Debtor.

Case No.: 19-42296-BDL

OBJECTION TO CONFIRMATION WITH
STRICT COMPLIANCE

COMES NOW, Michael G. Malaier, Chapter 13 Standing Trustee, and objects to
confirmation as follows:

BACKGROUND

Debtor filed this Chapter 13 case on July 12, 2019. The applicable commitment period is
sixty months. The case is currently in the third month and the Meeting of Creditors has been
completed. The bar date for filing non-governmental claims is November 5, 2019. Scheduled
unsecured claims total \$51,817.00. Debtor proposes to pay at least \$27,307.90 to allowed
nonpriority unsecured claims.

OBJECTION TO CONFIRMATION

OBJECTION

☒ Schedules or other documentation insufficient: Trustee requires the following information in order to complete his evaluation of this case.

(1) Two years of P&L statements from the debtor's business.

(2) Two years of bank statements for debtor's business.

(3) Two years of state and federal tax returns, including all attachments and schedules.

(4) All invoices and evidence of amounts paid to debtor's business in the last two years.

(5) Evidence of all claimed business expenses for the last two years.

(6) Evidence of the claimed "non-reimbursed work and travel expenses" for debtor's spouse.

☐ Other:

WHEREFORE, Trustee requests that the objection to confirmation be sustained and debtor be ordered to file a motion to confirm a plan resolving the issues raised herein within 14 days of entry of the Order Sustaining Trustee's Objection to Confirmation; and to set the hearing on the next available motion calendar after the 14 days expires. If the Motion to Confirm resolving the Trustee's issues is not filed and set for hearing as outlined above, the Trustee requests he be allowed to enter an order dismissing the case, *ex parte*, without notice.

DATED this 10th day of October, 2019.

/s/ Matthew J.P. Johnson

Matthew J.P. Johnson, WSBA# 40476 for
Michael G. Malaier, Chapter 13 Trustee